

ANDREW E. BAKOS, SBN 151250
ANDREW E. BAKOS & ASSOCIATES, P.C.
1545 River Park Drive, Suite 205
Sacramento, California 95815
Tel: (916) 649-0208
Fax: (916) 649-0941
Aebakos@Bakoslaw.com

DENNIS B. HILL, SBN 218131
D.B. HILL, A PROFESSIONAL LAW CORPORATION
640 Fifth Street, Suite 200
Lincoln, California 95815
Tel: (916) 434-2553
Fax: (916) 434-2560
Dennis@DbhillLaw.com

Attorneys for Plaintiffs CANNON HUGH DANIELS,
ARIELE ROSTAMO aka ARIELE NELSON, SUSAN
ADELL DANIELS, and JOSEPH ALBERT DANIELS, IV

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CANNON HUGH DANIELS, deceased; decedent's wife, ARIELE ROSTAMO aka ARIELE NELSON; decedent's mother, SUSAN ADELL DANIELS; and decedent's father, JOSEPH ALBERT DANIELS, IV, individually,

Case No.: 2:21-cv-0277 JAM-JDP

STIPULATION AND ORDER

Plaintiff,

VS.

CALIFORNIA FORENSIC MEDICAL GROUP, INC., WELLPATH MANAGEMENT, INC., BUTTE COUNTY, S. Parker, D. Brownfield, Sergeant Turner, Sergeant Behlke, Deputy Darnell, Deputy Smith, Deputy Yee, Deputy Bazan, Deputy Thornton, Sergeant Mell, Deputy Lazurenko, Deputy LaRue, Deputy Ogden, Deputy Mayfield, Deputy Davis, Deputy Tauscher and Lt. Jarrod Agurkis, SACRAMENTO COUNTY, Officer McKersie, Sergeant Bunn, Sergeant Jenkins, Officer Rickett, Lieutenant Hodgkins, Officer Gailey, Officer Tallman, Officer Pomosson, and Officer Folena

Complaint Filed: 02/11/2021

Defendants.

Pursuant to the minute order entered by the Court on July 26, 2024, the parties hereby submit this JOINT STIPULATION AND [PROPOSED ORDER] to set forth a discovery schedule concerning plaintiffs' expert replacement.

IT IS HEREBY STIPULATED by and between the parties through their counsel of record:

1. Plaintiff has identified Marc Eckstein, MD as the expert replacing Dr. Sperry and have produced Dr.
Eckstein's report to defendants.
2. Defendants shall have until the end of September 13, 2024, to depose Dr. Eckstein;
3. Defendants' experts shall have three weeks after the deposition of Dr. Eckstein to provide any revised
expert reports or rebuttal reports;
4. Plaintiffs shall have three weeks after the provision of Defendants' revised expert reports to depose
any such defendants' experts only with regard to any revised opinions;
5. In order to accommodate potential calendar conflicts, the parties may mutually agree in writing (email
shall be sufficient) to adjust the deadlines set forth above so long as all such expert discovery is
completed no later than October 31, 2024.

IT IS SO STIPULATED.

Date: August 1, 2024

GORDON REES SCULLY MANSUKHANI

By /s/ Kendra N. Stark
Kendra N. Stark
Attorneys for Defendants California Forensics
Medical Group Incorporated and Wellpath
Management, Inc.

Date: August 1, 2024

ANDREW E. BAKOS & ASSOCIATES, P.C.

By /s/ Andrew Bakos
Andrew Bakos
Attorney for Plaintiffs

Date: August 1, 2024

D.B. HILL, A PROFESSIONAL LAW CORPORATION

1
2 By /s/ Dennis B. Hill
3 Dennis B. Hill
4 Attorney for Plaintiffs
5
6

ORDER

- 7 1. Defendants shall have until the end of September 13, 2024, to depose Dr. Marc Eckstein;
8 2. Defendants' experts shall have three weeks after the deposition of Dr. Eckstein to provide any revised
9 expert reports or rebuttal reports;
10 3. Plaintiffs shall have three weeks after the provision of Defendants' revised expert reports to depose
11 any such Defendants' experts only with regard to any revised opinions;
12 4. In order to accommodate potential calendar conflicts, the parties may mutually agree in writing
13 (email sufficient) to adjust the deadlines set forth above so long as all such expert discovery is
14 completed no later than **October 31, 2024**.

15 **IT IS SO ORDERED.**
16

17 Dated: August 09, 2024

/s/ John A. Mendez

18 THE HONORABLE JOHN A. MENDEZ
19 SENIOR UNITED STATES DISTRICT JUDGE
20
21
22
23
24
25
26
27
28